

## **CC Docket No. 94-102 – E911 Interim Report**

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Date: July 31, 2003

To: Marlene H. Dortch, Secretary  
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By Electronic Submission:

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## **TIER III CARRIER INTERIM REPORT CC Docket No. 94-102**

Commnet Wireless, Inc. (“CWI”) and Commnet of Arizona, L.L.C. (“Commnet/AZ”) (collectively “Licensee”) hereby submit their E911 Interim Report, pursuant to *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), and *Public Notice*, DA 03-2113, released June 30, 2003. (Assignment of Commnet/AZ’s license to CWI is currently pending before the FCC. CWI plans no changes regarding E911, and will continue using the same E911 compliance officer and plans.)

### **Carrier Identifying Information:**

**Carrier Name:** Commnet Wireless, Inc. – FRN 0004-1593-80  
Commnet of Arizona, L.L.C. – FRN 0009-2912-20

**E911 Compliance Officer:** David Walker  
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### **E911 Implementation Information:**

In February 2003, FCC rules changed, and carriers were given the flexibility to pursue alternative business models. Licensee has moved to an alternative business model, specifically, becoming a “carriers’ carrier”. Thus, Licensee has no retail business, providing only wholesale service to other carriers. LICENSEE THUS HAS NO SUBSCRIBERS AND WILL NOT HAVE ANY SUBSCRIBERS. Based on this premise, Licensee hereby reports as follows:

- Licensee has received one Phase I request and no Phase II requests from PSAPs. Licensee has obtained and installed all of the network equipment and software necessary to meet the PSAP’s Phase I request. However, Licensee is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and is currently still working with the local exchange carrier (“LEC”) to have a landline installed. Licensee’s system operates in rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Licensee is still waiting for the installation of the landline connection to the requesting PSAP, and thus the PSAP’s request has been outstanding longer than six-months. Licensee anticipates that installation of the landline to be completed in the very near future.
- Licensee is employing a handset-based solution for incoming roamers. Licensee is using TDMA technology supplied by Airbiquity. Airbiquity is based in the State of Washington.
- Licensee intends to serve incoming roamers using a handset-based solution. As such, Licensee has installed all of the necessary network equipment for Phase I E911 deployment. Licensee anticipates a significant problem with its Phase II E911 deployment. Specifically,

Licensee elected to use a handset-based solution for its E911 deployment, because it was the only attainable solution, either technically or financially. Recently, the FCC ruled that Airbiquity, the only vendor of TDMA handset-based solutions, was not offering a Phase II-compliant handset. Now, neither Airbiquity nor any other vendor will be supporting a handset-based TDMA solution. Moreover, Licensee is unable to switch to a network-based solution, because it is technically impossible. For a network-based solution to function, a handset must be located within the reliable service area of at least three cell sites simultaneously, in order to triangulate the position of the handset. Licensee operates only in remote, rural areas where the cell sites are spread far apart and there is little overlap between two cells, and never any overlap among three cells. Thus, a roamer's handset would ever be located within the reliable service area of three cells simultaneously, and triangulation of its position would be impossible.

- Licensee obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. Licensee did not encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. Licensee added no new subscribers after October 1, 2002. As previously discussed, following the rule change to allow licensees to operate entirely as a “carriers’ carrier”, Licensee went to that business model. Licensee currently has no subscribers, but, rather, serves only the customers of other carriers. Licensee will not have any future subscribers.
- Licensee does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above pertaining to the issues with the absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond Licensee's control. Licensee will be filing a request with the Commission for a permanent waiver of the Phase II requirements in the near future.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.